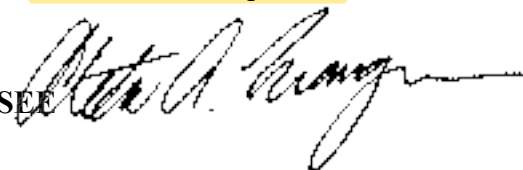


**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**



UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:22-CR-00327
)	
[1] CHESTER GALLAGHER)	JUDGE TRAUGER
[2] HEATHER IDONI)	
[3] CALVIN ZASTROW)	
[4] COLEMAN BOYD)	
[6] PAUL VAUGHN)	
[7] DENNIS GREEN)	
[8] EVA EDL)	
[9] EVA ZASTROW)	
[11] PAUL PLACE)	

**UNOPPOSED AND JOINT MOTION TO ENLARGE TIME TO FILE 404(B)
OBJECTIONS AND RELATED DEADLINES**

COME NOW Defendants Chester Gallagher, Paul Vaughn, Coleman Boyd, Eva Edl, Dennis Green, Heather Idoni, Paul Place, Calvin Zastrow, and Eva Zastrow¹, by and through counsel, and hereby request additional time to October 27, 2023 to file their objections to the government's 404(b) notice that was provided on October 6, 2023, and the government's responses to those objections would be due November 13, 2023.

In support of this motion, the defendants submit the following:

As of the last status conference on August 4, 2023, the parties have engaged in plea negotiations, some of which have been complicated by some of the defendants' other pending matters. The plea negotiations took longer than anticipated resulting in the government providing the defendants with additional time to confer with counsel about their respective plea proposals.

¹ Undersigned counsel has not heard back from counsel for codefendant, James Zastrow, so counsel left Mr. Zastrow off the motion.